

REMARKS

In the Office Action mailed June 22, 2006, claims 1-23 and 43-51 were rejected under 35 U.S.C. § 102(e) as being anticipated by Fera. Applicants traverse and respectfully request reconsideration.

The Fera reference is directed to an apparatus and method for managing a fleet of mobile assets such as trains or other vehicles. Fera describes a system that utilizes, for example, locomotive fault detection sensors that are onboard the locomotive and a communication system that allows the downloading of the fault information from the sensors through a data link to a data center. (Fera, page 5, line 6 – page 6, line 9) Notably, the data received from the sensors is simply stored in a database residing in a data center. (Fera, page 5, lines 16-19, 24-25) A web based system utilizes multiple web pages that are updated to reflect the performance reports, operating statistics of the locomotive, current location map for the fleet of mobile assets, and other information stored in the database. (Fera, FIG. 2, blocks 39, 48 & 56) Based on the information thus stored, the web interface may also include service (i.e., maintenance) recommendations 60. (Fera, page 8, lines 6-8) Additionally, the web interface may also provide “information regarding services that are available 64 . . . that may be important to any decision regarding a maintenance recommendation 60.” (Fera, page 8, lines 17-19)

In contrast, the present invention as reflected, for example, in amended claims 1, 8, 43 and 46, recite processing of object-related information as performed, at least in part, by a “digital identity instance” corresponding to the object. As recited in the claims, the digital identity instance acts as a proxy for the object and is defined by instantiations of one or more service modules associated with the digital identity instance. Furthermore, the available services listed in the service registry are based on the one or more service modules associated with the digital identity instance. Support for these amendments to the claims may be found, for example, in

paragraphs [0029], [0036] and [0050] of the instant specification. In this manner, the digital identity instance supports mediated interactions with the object (paragraphs [0029] and [0084]) through its ability, via the service modules, to “perform one or more specific functions on behalf of that object” (paragraph [0036]). In this manner, the present invention provides a more sophisticated manner of interacting with objects in contrast with prior art systems, of which Fera is an example, that, at their most basic level, merely gather and report data concerning objects.

Applicants respectfully submit that Fera fails to teach digital identity instances as presently claimed, much less service registries listing available services for an object based on the one more service modules associated with that object’s digital identity instance. Applicants have noted the reference to page 5, lines 8-14 of Fera, which it is alleged teaches the claimed digital identity instance representative of an object. However, the cited portion of Fera merely refers to an identifier that may be associated with an object, as well as the data regarding that object that may be communicated as desired. From this, it is Applicant’s understanding that the object identifiers and object data taught by Fera are collectively being equated with the presently claimed digital identity instance. However, as noted above, the digital identity instances of the present invention are substantially more than an object identification and related object data. In particular, Fera fails to teach anything comparable to, or even suggesting, one or more service module instantiations that define the digital identity instance that thereby acts as proxy for the object, particularly during interactions providing or requesting information concerning the object. Furthermore, the services taught by Fera have nothing to do with one or more services modules associated with the digital identity instance and instantiated on behalf of the object. At best, the services taught by Fera concern services that can be performed *on the object*, as opposed to *on behalf of the object*.


Thus, to the extent that Fera fails to teach digital instance identities or service registries as present claimed, Applicants respectfully submit that Fera fails to anticipate claims 1, 8, 43 and 46, which claims are seen to be in suitable condition for allowance.

With regard to claims 2-7, 9-23, 44, 45, and 47-51, Applicants note that these claims are dependent upon independent claim 1 (claims 2-7), independent claim 8 (claims 9-23), independent claim 43 (claims 44 and 45) and independent claim 46 (claims 47-51). Because claims 2-7, 9-23, 44, 45, and 47-51 incorporate the limitations of the independent claims from which they depend, Applicant submits that Fera fails to anticipate claims 2-7, 9-23, 44, 45, and 47-51. Therefore, Applicant respectfully submits that claims 2-7, 9-23, 44, 45, and 47-51 are in suitable condition for allowance.

Applicants respectfully submit that the claims are in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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